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## Before the FEDERAL COMMUNICATIONS COMMISSIFEMENT COMMUNICATIONS COMMISSION Washington, D.C. 20554 OFFICE OF SECRETARY

In the Matter of ) MM Docket No. 96-260 Amendment of Section 73.202(b) ) RM-8965 Table of Allotments ) FM Broadcast Stations ) (Mankato, Minnesota)

To: Chief, Allocations Branch

#### COMMENTS IN SUPPORT OF PROPOSED RULEMAKING

On December 22, 1996, the Federal Communications Commission (the "Commission") released a Notice of Proposed Rulemaking in this docket proposing the allotment of Channel 231A to Mankato, Minnesota as that community's third FM broadcast service. These Comments are filed in support of that proposal.

Mankato is a growing and vibrant community of over 31,000 people. As shown in Attachment 1, Mankato boasts 22 healthcare facilities and has many local and regional high schools as well as several institutions of higher learning including Mankato State University, South Central Technical College, Bethany Lutheran College, Rasmussen College and Gustavus Adolphus College. Overall, the area has 27 educational institutions and over 40 houses of worship.

The area supports a Civic Center with 38,000 square feet of space for audiences of up to 5,000 people. The Civic Center therefore draws conventions, sporting events, trade shows, seminars and celebrations of all sorts all of which need many and various means to promote their events. The Mankato/North Mankato area is also a major regional retail center. The Mankato Chamber

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and Convention Bureau estimates that over 300,000 customers from southern Minnesota and northern Iowa are attracted to the specialty shops, malls, restaurants and nightclubs of these towns.

Mankato's commercial sector supports four employment agencies and two employment training services. There are at least 15 real estate agencies in Mankato itself to support the real estate needs of Mankato's businesses and their employees, and three more in North Mankato.

Many successful businesses were founded in Mankato including Honeymead, Hubbard Milling, Kato Engineering, Mankato Corporation and Taylor Corporation. More recent additions to the Mankato economy include American Linen, Clear With Computers, EI Microcircuits, Kaye Corporation, Kristico, Multi-Block, Inc., Phenix Biocomposites, Sween Corporation, V-Teck and from Japan and Thin Film Technology. Serving these companies and Mankato's residents is Mankato Municipal Airport which accommodates 727 and DC-9 jet aircraft. The area is also served by the Chicago and Northwestern Railroad and 12 commercial freight carriers. Twelve banking institutions are supported by the area.

On the cultural side, Mankato is proud of its own 220 piece symphony orchestra and ballet company. Also contributing to the cultural richness of the area, Mankato State University's Theater Art Department holds regular theatrical productions and the other institutions of higher education utilize their large auditoriums for music recitals and cultural festivals.

Mankato is governed by a strong council/manager organization with a 1996 budget of over \$34,000,000.

Detail behind these statistics can be found in the Mankato area Chamber and Convention Bureau moving packet and, the Mankato area Chamber and Convention Bureau Membership Directory, many pages of which are attached to these Comments as Attachment 1.

The evidence is clear that Mankato is a strong and varied community whose full broadcasting needs cannot possibly be served by its limited current compliment of stations. Therefore, if the requested allotment is made I have a present intention to apply for the channel and, if authorized, to build the station promptly.

Respectfully submitted,

### ATTACHMENT 1

# Mankato Area Chamber & Convention Bureau Moving Packet

## Welcome to Mankato!



For more information contact the Chamber and Convention Bureau P.O. Box 999 Mankato, MN 56002

> (507) 345-4519 (800) 657-4733

**F**or whatever medical attention is necessary, the Mankato area has many facilities to choose from.

#### Hospitals/Clinics

Immanuel-St. Joseph's 1025 Marsh Street Mankato, MN 56001 625-4031

Diagnostic Center 304 Belle Avenue Mankato, MN 56003 388-1655

Psychiatric Clinic of Mankato 410 Jackson Street Mankato, MN 56001 387-3195

North Mankato Family Health Clinic 1575 Lookout Drive North Mankato, MN 56003 625-5027

North Ridge Clinic 1695 Lor Ray Drive North Mankato, MN 56003 387-8231 Phillip Clinic 103 North Broad Mankato, MN 56001 345-5049

Mankato Clinic 1230 Main St Mankato, MN 56001 625-1811

One to One Clinic 1008 South Front Mankato, MN 56001 388-9950

Planned Parenthood of Minnesota 310 Belle Avenue Mankato, MN 56001 387-5581

Wellness Center of Minnesota 210 East Walnut Mankato, MN 56001 345-7898 Addictions & Stress Clinic 423 South Broad Mankato, MN 56001 345-4670

ASC Psychological Clinic 201 North Broad Mankato, MN 56001 345-4679

Orthopedic & Fracture Clinic PA 309 Holly Lane Mankato, MN 56001 388-6265

Mankato Chiropractic Center 83 Navaho Avenue Mankato, MN 56001 345-4035

Family Podiatry Clinic 65 Teton Lane Mankato, MN 56001 345-6960

Wenger Physical Therapy 1681 Commerce Drive North Mankato, MN 56003 625-8017 Laboratory of Clinical Medicine 304 Belle Avenue Mankato, MN 56002-3288 625-2646

#### **Nursing Homes**

Mankato Lutheran Home 718 Mound Avenue Mankato, MN 56001 387-2475 Thro Company Highway 169 South Mankato, MN 56001 625-8741

Oaklawn Health Care Center 1112 Mulberry Street Mankato, MN 56001 388-2913 Mankato House Health Care Center 700 James Avenue Mankato, MN 56001 345-4631

Hillcrest Health Care Center Hwy 169 South Lehillier 387-3491 The various media outlets can help keep you in touch with Mankato news.

#### **Print Publications**

Mankato Free Press (daily newspaper except Sunday) 418 South Second Street Mankato, MN 56001 625-4451 Home Magazine (bi-weekly shopper) 215 Maxfield Mankato, MN 56001 387-7953

The Land 418 South Second Street Mankato, MN 56001 345-4523

#### Radio/Television

KEYC-TV Station 1570 Lookout Drive PO Box 128 North Mankato, MN 56003 625-7905

KEEZ-FM Station Highway 169 South PO Box 3345 Mankato, MN 56002 345-4646

KXLP-FM / KYSM-AM/FM Members of Pro Radio Group 1807 Lee Blvd PO Box 2268 North Mankato, MN 56003 388-2900

KTOE-KDOG Station Highway 14 East PO Box 1420 Mankato, MN 56001 345-4537/625-9197

KCAC / KNGA Station Gustavus Adolphus St. Peter, MN 56082 625-5422

### Mankato State University

The Reporter
Mankato State University
Box 38
Mankato, MN 56002
389-1776

KMSU Radio Station Mankato State University Box 153 Mankato, MN 56002 389-5678 If it's time to buy or sell, get in touch with one of these Mankato area realtors.

Ace Realty 423 Belgrade Avenue North Mankato, MN 56003 625-4985

Action Realty 1620 S. Riverfront Drive Mankato, MN 56001 625-9375

Blue Ribbon Realty 107 South Front Street Mankato, MN 56001 625-2580

Better Homes & Gardens George Smith Realtors, Inc. 342 Belgrade Avenue North Mankato, MN 56003 625-8080

Century 21-Atwood Realty 209 South Second, Suite 200 Mankato, MN 56001 387-3131

Coldwell Banker Realty 113 North Broad Street Mankato, MN 56001 387-1131 2104 North Riverfront Drive Mankato, MN 56001 625-4303

Hiniker Realty

Lloyd Realty & Management 140 Homestead Drive Mankato, MN 56001 625-5573

Jesco Realty PO Box 2266 North Mankato, MN 56003 625-1010

Julian Realty 1803 East Main Mankato, MN 56001 387-1234

Kvasnicka Realty 209 South Second Mankato, MN 56002 387-3131

Layman-Todd Realty Inc. 1111 Madison Avenue Mankato, MN 56001 387-6661 Midwest Realty 505 Long Street Mankato, MN 56001 345-1121

Minnesota Valley Realty 110 West Elm Street Mankato, MN 56001 345-7958

Rolling Hills Realty 600 South Second Street Mankato, MN 56001 387-4006

Schmaltz Realty 520 West Pleasant Mankato, MN 56001 345-4266

South Central Realty 153 Chestnut Mankato, MN 56001 345-1455

Fisher & Lidstrom Commercial Realtors 209 South Second Street Mankato, MN 56001 625-4715

# When apartment searching, check out what the Mankato area has to offer.

Beltower Apartments, 442 Belgrade Avenue	625-4715
Blue Heron Apartments, 160 Homestead Road	625-5573
Colony Apartments, 1700 Lee Boulevard	625-5573
Colonial Square Apartments, 300 Ramsey	345-1321
Koppen Gardens, 615 Nicollet Avenue	<i>388-3202</i>
Pleasant Estate, 1600 Pleasant View	345-3879/388-9375
Pleasantview Apartments, 1732 Pleasant View Drive	625-5573
Devonshire Apartments, 200 Briargate Road	<i>345-8543</i>
Downtowner Apartments, 405 North 5th Street	<i>388-7724</i>
Durham Apartments, 621 South Second Street	345-1400
Eastport Apartments, 1001 Eastport	<i>345-5141</i>
Garfield Place, 543 Garfield Avenue	<i>345-1725</i>
Glenwood Terrace Apartments, 115 Parkway Avenue	<i>387-1217</i>
Highland Hills Apartments, 1400 Warren Street	<i>388-9351</i>
Hilltop Lane Apartments, 50 Hilltop Lane	<i>388-9158</i>
Hoover Estate Apartments, 1865 Northway Drive	<i>386-1004</i>
Huntington Hills Apartments, 100 Huntington Drive	<i>387-3771</i>
Meadow Views Apartments, 1261 Pohl Road	3 <b>45-695</b> 1
Security Apartments, 307 South Broad	<i>345-3036</i>
Southridge Apartments, 200 Briargate Road	625-2787
Southwood Terrace Apartments, 520 James Avenue	<i>387-4748</i>
Sunrise Village Apartments, 1620 Village Court	<i>387-8120</i>
Valley View Apartments, 470 James Avenue	345-4009
Village Place, 104 Thomas Drive	625-6167
Woodbridge Apartments, 1647 Pleasant View	<i>345-1290</i>
Heather Lane, 108 Heather Lane	625-5573
Knollcrest Apartments, 120-122 Knollcrest Drive	<i>387-2865</i>
Commodore Apartments, Commodore and Deldona	<i>387-3263</i>
The Quads, 142 Bunting Lane	<i>625-6961</i>
Park Apartments, 123 North 4th Street	<i>387-1131</i>
Parkway Apartments, 101-103 Parkway	<i>388-6324</i>
State Street Apartments, 408 State Street	625-7454
Crown Apartments, 601 Pfau Street	<i>345-6171</i>
CampusView Apartments, 1340 Warren Street	<i>387-5426</i>
Cherry Ridge Apartments, 101 Glenwood Avenue	625-5573
Fairfield Townhouses, 1620 Pleasant View Drive	625-5573

**M**ake the job search easier by using one of these Mankato area agencies.

#### **Employment Agencies**

Express Personnel Services 113 Monroe Avenue North Mankato, MN 56003 387-5620

Manpower Temporary Services 1645 Mankato Place Mankato, MN 56001 345-4201

Quality Temp 1600 Madison Avenue Mankato, MN 56001 387-4141 Minnesota Department of Jobs & Training 1650 Madison Avenue Mankato, MN 56001 389-6723

Pro Staff Personal Services 510 Long Street Mankato, MN 56001 387-5530

### **Employment Training Services**

Life Work Planning Center 410 Jackson Street Mankato, MN 56001 345-1577

South Central Private Industry Council 410 Jackson Street Mankato, MN 56001 345-7064 **P**rofessional childcare opportunities are numerous in the Mankato area.

#### **Preschools**

Bethel Baptist Church Preschool Learning Center 1250 Monks Avenue Mankato, MN 56001 345-4011

Creative Playtime Preschool 720 S. Second Mankato, MN 56001 387-1548

Mankato Headstart 302<sup>1</sup> Chestnut Mankato, MN 56001 345-3565

Montessori School 816 Hubbell Avenue Mankato, MN 56001 388-6859

North Mankato Headstart 407 Belgrade Avenue, North Mankato, MN 56003 345-3032

Peter Pan Preschool 4th and Main Mankato, MN 56001 625-6701

### **Childcare Facilities**

Children's House Mankato State University Mankato, MN 56001 388-5478

Partners in Care 413 N 4th Mankato, MN 56001 345-8787

YWCA 603 S. Second Mankato, MN 56001 345-4629 TechniKids
South Central Technical College
1920 Lee Blvd.
N. Mankato, MN 56002
389-7200

New Day Child Care Center 309 Bermuda Dr Mankato, MN 56001 388-6774

Golden Heart Child Care 1825 Commerce Dr N. Mankato, MN 56003 Trinity Christian Day Center Sherman and Webster Avenue N. Mankato, MN 56003 388-7761

Hugs-N-Kids, Inc. 1221 Caledonia St. Mankato, MN 56001 388-5478

Jesus Loves Me Child Care Center 304 Monroe Ave. N. Mankato, MN 56003 345-7707

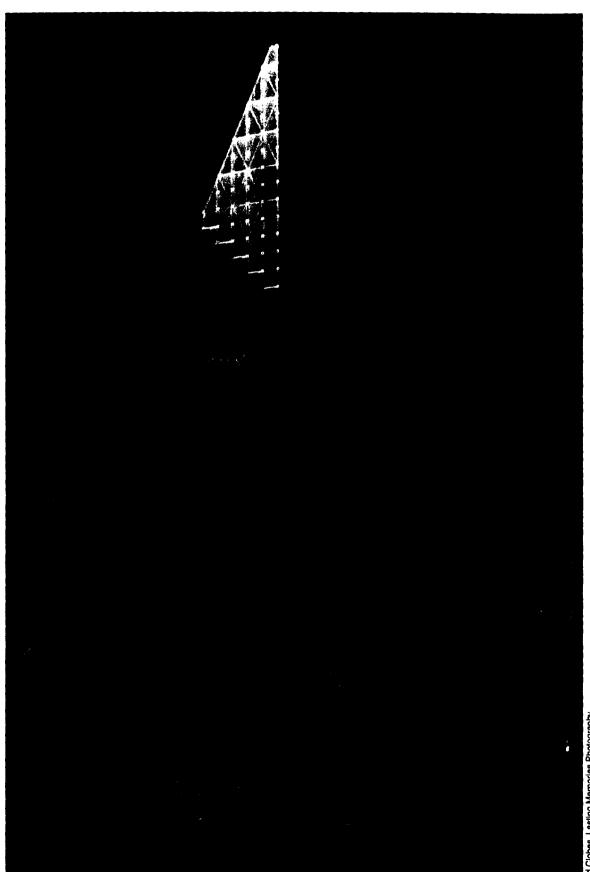
# The Mankato area has educational opportunities available for everyone.

Post-Secondary	
Mankato State University, Mankato, MN Bethany Lutheran College, 734 Marsh South Central Technical College, 1920 Lee Blvd Cosmetology Training Center, 111 East Hickory Rasmussen College, 501 Holly Lane	389-2463 386-5300 389-7200 345-4033 625-6556
<u>Special</u>	
Alternative High School, Lincoln Community Center Community Services/Recreation Dept., Lincoln Community Center	387-3047 387-5501
Senior/Junior	
East High School, Hoffman Road West High School, South Riverfront Drive Immanuel, 421 North Second Loyola, Good Counsel Drive	387-5671 387-3461 345-3027 388-2997
<u>Special</u>	
Fitzgerald, 110 North 5th. Dakota Meadows, 1900 Howard Dr.	388-9344 387-5077
<u>Elementary</u>	
Franklin, North Second & Lafayette Hoover, 1524 Hoover Dr. Jefferson, 100 James Kennedy, 2600 East Main Monroe, 441 Monroe Avenue Roosevelt, 600 Owatonna Washington, 1100 Anderson Grace Christian, 600 Lind Holy Rosary, 546 Grant Ave Immanuel, 421 North Second Mount Olive, 1123 Marsh St. Joseph-St. John's, Blue Earth & Hubbell St. Mark Lutheran, Sibley & West 7th	345-4287 388-5202 388-5480 387-2122 387-7889 345-4285 345-3059 388-9355 345-6765 345-3027 345-7927 388-2536 388-6624
St. Peter & Paul's, 110 North 6th	387-3316

 ${m F}$  or whatever the preference, the Mankato area has numerous places of worship to choose from.

<b>Baptist</b>	
Bethel Baptist, 1250 Monks Ave	345-4011
First Baptist, Second & Cherry	387-5651
Grace Baptist, 6th and Lind	<i>388-9355</i>
Hope Baptist, 150 Jaycee Court	387-3222
Catholic	
Holy Rosary, Grant & Sherman	387-6501
St. John's, 632 South Broad	625-3131
St. Joseph's the Worker, 816 Hubbell	388-3766
St. Peter & Paul's, 5th and Mulberry	388-2995
<b>Lutheran</b>	
Bethlehem, 720 South Broad	388-2925
Campus Lutheran, Birchwood & Ellis	387-6587
Christ Our Redeemer, City Rd 33 & 7th	345-4867
Christ the King, 207 McConnell	345-5056
Good Sheppard, 937 Charles Ave	388-4336
Grace, 4th & Main	345-4248
Hosanna, 105 Hossana Ave	388-1766
Immanuel, Second & Spring	345-3027
Messiah, 1706 Lee Blvd	<i>387-5537</i>
Mount Olive, 1123 Marsh	345-4966
Our Savior's, 1103 North Broad	345-5112
St. Mark's, Sibley & West 7th	388-2013
St. Paul's, Monroe & Range	345-4939
Word of Life, 105 Homestead	387-3857
<u>Methodist</u>	
Belgrade, 601 Belgrade Ave	625-3759
Centenary, Second & Cherry	387-4074
Hilltop, 108 South Manitou Dr	387-3877
United Methodist, 1529 Nottingham	625-5330
<b>Others</b>	
Church of Christ, 1210 Warren	387-2521
Church of Jesus Christ of Latter Day Saints, 1851 Marie Ln	625-8342
Church of Nazarene, 309 Bermuda Dr	388-6774
Community Christian Church, Summit Center, 5th & Warren	625-6342
Evangelical Covenant, 354 Carol Ct	387-5606
First Christian Church, 1735 E. Main	387-2197
First Church of Christ Scientists, 523 South St	387-4333
First Congregational, Second & Cherry	387-6592
Jehovah's Witness, 420 Marie Lane	388 <b>-</b> 5757
Multi Church Center, Second & Cherry	387-4073
St. John's Episcopal, Broad & Warren	388-1969
Trinity, Sherman & Webster	<i>388-7761</i>
United Pentecostal, 119 State	388-1331
First Presbyterian, 220 E. Hickory	387-2160
The Salvation Army, 1015 Front	345-7840
Seventh Day Adventist, 210 Pohl Rd	625-8625
Unitarian Universalists, 114 Pohl Rd.	388-5022
Joint Ministry, 331 Dillon	625-6779

## Strength in Knowledge... Committed to Excellence



Mankato State
University
Interpretation
University
Univ

d Clobes, Lasting Memories Photograph,

ducation is a top priority in Mankato
• North Mankato. Whether it is young students starting kindergarten or non-traditional students returning to school to continue their education, they find a high-quality and progressive environment in which to learn.

Minnesota's Open Enrollment program at the primary and secondary level allows students to attend the school of their choice regardless of location inside or outside of their geographical district.

Local students ACT scores consistently average higher than the state's and the nation's average test scores.

Students and their families also have the option to combine religious enrichment with their education by attending one of a dozen private schools.

Many local and regional high school graduates choose to continue their education within the community and find excellent options.



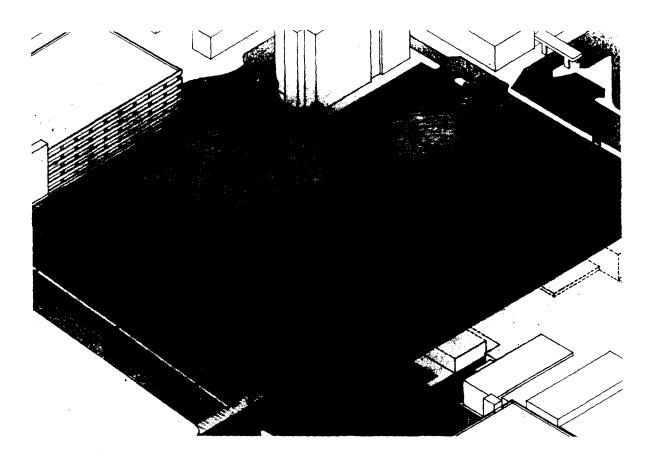
Area schools boast record scholastic excellence consistently high above national standards.



Students of all ages pursue lifelong learning.

- Mankato State University is the largest post secondary institution in southern Minnesota. MSU confers more than half of the graduate degrees earned throughout the entire Minnesota State University System.
- South Central Technical College offers
  27 educational programs including a
  continuing education and customized training
  division.
- Bethany Lutheran College is a two-year liberal arts school with an emphasis on personal small class size and close contact with academic advisers.
- Rasmussen College offers students comprehensive training through two-year programs for a wide variety of business careers.
- Gustavus Adolphus College, a private Lutheran college, is located just 12 miles away in the city of St. Peter.

## Entertainment Galore... a Regional Hub



The beautiful Mankato Civic Center and Arena offers 38,000 square feet of space for audiences of up to 5,000 people.

ew in 1995, the Mankato Civic

Center and Arena hosts

conventions, sporting events, trade

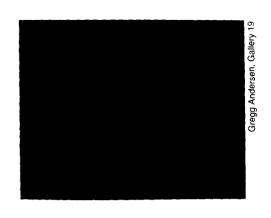
shows, seminars and celebrations of all sorts.

The Center is located in the heart of

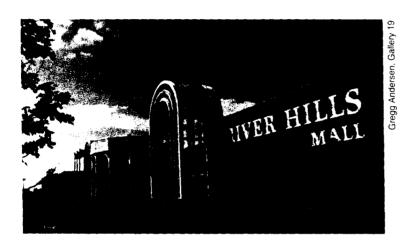
The Center is located in the heart of downtown, close to accommodations, charming plazas, restaurants and shops.

The annual Celebration of Lights attracts people from throughout the Midwest during November and December. Hundreds of thousands of lights line area businesses and entire neighborhoods glow with this marvelous holiday exhibit.

Those who prefer shopping will appreciate Mankato • North Mankato as a major regional retail center. Over 300,000 customers from southern Minnesota and northern Iowa are attracted to the quaint specialty shops, expansive malls, and delectable restaurants and night clubs.



Lights of the season brighten up area businesses and neighborhoods during November and December.



Hundreds of thousands of square feet of retail stores and restaurants have been added to the community in recent years.



Quaint specialty shops are the delight of shoppers in Old Town, in historic downtown Mankato.

## a Touch of Class ... Enriching Our Lives



MSU's Ted Paul Theatre has to years been one of the factors of ticket borders in the nation.

hether your taste runs to chordle or symphony music, theatrical productions, festivals or museums you will find plenty of opportunities in

Mankato • North Mankato.

The Mankato Symphony Orchestra entertains audiences each season with a delightful array of musical selections. The 220-piece orchestra showcases world renowned guest artists including national and international musicians.

#### Mankato State University's Theatre Arts

**Department** is a perennial success dedicated to providing the highest quality of theatrical production through excellent directors, superbactors and beautifully designed sets.

Ylvislaker Auditorium on the campus of Bethany Lutheran College provides a beautiful venue for piano, instrumental and vocal recitals.

The Mankato Ballet caters to all ages throughout the year and its performers delignt holiday audiences with the Nuteracker Swte.

The Andreas Observatory at Manketo State University offers the largest telescope in the state and is accessible to school children and the general public. The Mankato Public School Planetarium is one of only three and facilities in Minnesota high schools. Over 11,000 students visit the planetarium each year for a dazzling show of the universe.

Cultural diversity is experienced through the Mdewakanton, Mah-Kato

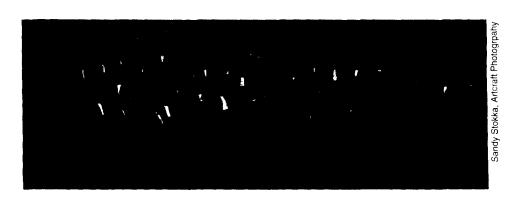
Traditional Powwow held each full and through the annual International Festival.



The Mankato Ballet performs a variety of short and full productions.

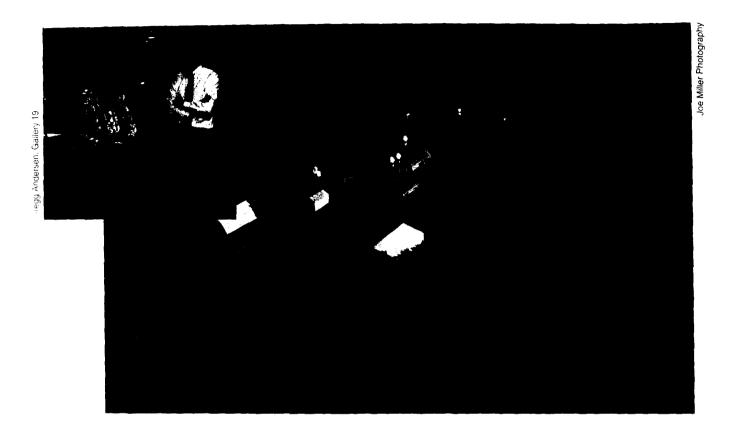


The International Festival celebrates cultural diversity and promotes global awareness throughout the community.



The Mankato Symphony Drohestra, the only full prohestra in south central Minnesota for over 40 years.

## Prosperity & Success... It's the People



The community is well balanced as a commercial, industrial and agricultural base and is only slightly affected by swings in the nation's economy

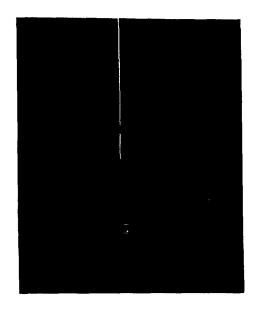
ommitment to quality is evident in all types of area business. From retail stores to manufacturing plants, local employees maintain a high work ethic and are dedicated to "a job well done."

Originally an agricultural hub, the area now maintains a strong, diverse economy with many area businesses competing in the global marketplace. The community's greatest asset is its people, building its reputation on their work ethic and productivity.

Throughout our history, many successful businesses were founded in Mankato • North Mankato and continue their operations today. Included are Honeymead. Hubbard Milling, Johnson Worldwide Associates (formerly Johnson Fishing), Kato Engineering, Mankato Corporation and Taylor Corporation.

The entrepreneurial spirit exhibited by these businesses exists still today. Each year, our community is privileged to usher in new ventures. More recent additions to our economy are American Linen. Clear With Computers E.I. Microcircuits, Kaye Corporation, Kristico, Multi-Bloc, Inc., Phenix Biocomposites, Sween Corporation V-Tek and from Japan. Thin Film Technology.

This community is an ideal place for people to follow their career paths. Plenty of opportunities are offered in health care, education, high technology, manufacturing, printing, retail and service related industries.



Since 1946, MICO Incorporated has designed and manufactured hydraulic components and has become a worldwide supplier to customers who demand the highest quality.



Sween Corporation is a home-grown business that started as a basement operation. Today, the company employs over 150 people.



1996-97 Membership Directory

## Mankato/North Mankato

#### QUICK REFERENCE FACTS

The population within a 60 mile radius of Mankato/ North Mankato is 417.730, which includes 16 counties in Minnesota.

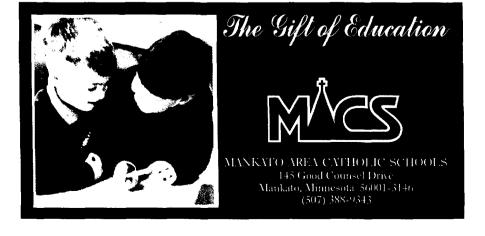
The extended population of our market area, which

includes the northern tier of Iowa, adds an additional 215,000. The total population of our extended market area is 633,587 and includes 21 counties.

RETAIL SALES	\$552,394,671 (Mankato/North Mankato, 1992)	
CHURCHES	52	
SCHOOLS	Mankato State University South Central Technical College Rasmussen College Bethany Lutheran College K-12 Public and Parochial: Enrollment 8,389	
NEWSPAPERS	1 daily: Mankato Free Press. 1 weekly shopper: Home Magazine	
RADIO STATIONS	KTOE-AM, KYSM-AM-FM, KEEZ- FM, KDOG-FM, KXLP-FM. KMSU-FM	
TELEVISION STATIONS	KEYC-TV (CBS Affiliate). CCTV (Public Access)	
LODGING	8 motels - 609 units	
THEATERS	16 movie theaters	
AUDITORIUMS	Mankato East High School Mankato West High School Mankato State University (Student Union and Performing Arts Center) The Kato Entertainment Center South Central Technical College Mankato Civic Center	

HEALTH CARE SERVICES	1 hospital with 272 beds. 12 clinics			
REHABILITATION AND MENTAL HEALTH CENTERS				
Location	Mankato	No	rth Mankato	
County	Blue Earth	ı Nie	Nicollet	
Region	9	9		
Distance:				
Minneapolis-	75 miles S	SW 75	75 miles SW	
St. Paul				
Senate District	24	24		
House District	24A	24	В	
POPULATION	1970	1980	1990	
	<u>Census</u>	Census	<u>Census</u>	
Mankato	30,895	28,637	31.377	
Blue Earth County	52,322	52,314	54.044	
North Mankato	7,347	9.145	10,700	
Nicollet County	24,518	26,920	28,200	

Source of Estimate: Bureau of the Census



#### CERTIFICATE OF SERVICE

I, James J. Wychor, do hereby certify that a true copy of the foregoing "Comments in Support of Proposed Rulemaking" was sent this 18th day of February, 1997 by U.S. first class mail, postage prepaid, to the following:

Abdolmjid Khalilzadeh
Philip A. Rubin & Associates, Inc.
1350 Connecticut Avenue, N.W., Suite 610
Washington, D.C. 20036

James J. Wychor